

EXHIBIT F

Fernands, Anastasia M

From: Fernands, Anastasia M
Sent: Thursday, June 02, 2005 1:45 PM
To: 'CAITLIN LHOMMEDIEU'; Horwitz, Ethan
Subject: RE: lack of production of documents (our ref no J333802)

Caitlin:

In your e-mail from yesterday evening, you proposed an 11 a.m. conference call for which we were not available. I am, however, available and happy to speak with you on either Friday morning or anytime on Monday.

In response to the concerns expressed in your e-mail, I wanted to provide you with some details about our production efforts. We have encountered two significant problems that have delayed our expected production date. First, we have been having problems getting the physical documents that were identified and gathered in Israel. Second, we have discovered that some documents that were forwarded to us in electronic form were corrupt and/or otherwise not accessible. We are attempting to correct these problems as quickly as possible.

I also want to address our continued serious concerns about BIS's production, particularly if the 1426 pages produced by BIS so far truly represent "most, if not all, of the relevant, responsive, non-privileged documents" of which BIS is aware. By way of example only, I note that the production appears to contain no correspondence, no documents concerning development of the invention claimed in the patent-in-suit, and no documents underlying or supporting the limited, overview financial documents that are contained in the production. I further note that this is by no means intended as an exhaustive list of our concerns about the BIS production.

Finally, following up on our telephone conference of yesterday, I have not heard back from you concerning whether the BIS Rule 30(b)(6) witness is available on any dates in June other than June 22. As we have pointed out, we purposefully organized our schedules based on the deposition timing that you worked out with Ethan, and we remain anxious to work out a mutually convenient schedule for the initial depositions during June. As we have also pointed out, June 22 is the one day that is now available for the deposition of the Red Bend Designee.

Please let me know what time tomorrow morning or Monday is convenient for you to discuss these issues.

Anastasia

-----Original Message-----

From: CAITLIN LHOMMEDIEU [mailto:CLHOMMEDIEU@gbpatent.com]
Sent: Thursday, June 02, 2005 1:06 PM
To: Horwitz, Ethan; Fernands, Anastasia M
Cc: ASHWIN SAPRA
Subject: lack of production of documents (our ref no J333802)

Dear Ethan and Anastasia:

Following up on my e-mail from yesterday, we still have not received any documents from you, nor have we had any response to that e-mail. We therefore ask that you let us know the earliest times that you are available for a meet and confer.

Thank you,

Caitlin Lhommedieu, Esq.
Greenblum & Bernstein
703-716-1191 (phone)
703-716-1180 (fax)
<www.gbpatent.com>

The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and as such is privileged and confidential. If the reader of this message is not the intended recipient or an agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this document in error and that any review, dissemination, distribution, or copying of this message is strictly prohibited. If you have received this communication in error, please notify us immediately by e-mail, and delete the original message.
